

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed December 16, 2003. Upon entry of the amendments in this response, claims 1 – 8, 10 – 17, 19 – 26, 28 – 30 and 32 – 58 are pending. In particular, Applicant has amended claims 21 and 30, has added claims 32 – 58, and has canceled claims 9, 18, 27, and 31 without prejudice, waiver, or disclaimer. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

I. Indication of Allowable Subject Matter

Applicant acknowledges that claims 9, 18, 27 and 31 have been indicated as “allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.” (Office Action, pg. 4).

Applicant has rewritten claims 9, 18, 27, and 31 in independent form by incorporating all of the limitations of their respective base claims and any intervening claims into new independent claims 36, 43, 50 and 57, respectively. Accordingly, Applicant submits that each of independent claims 36, 43, 50 and 57 is allowable. Furthermore, because independent claims 36, 43, 50 and 57 are allowable over the prior art of record, dependent claims 37 – 42, 44 – 49, 51 – 56, and 58 are allowable as a matter of law for at least the reason that they contain all the features and elements of their responding independent claim.

II. Claims 1 – 4, 6 – 8, 10 – 13, 15 – 17, 19 – 22, 24 – 26, 28 – 30 are Patentable Over *Minard*

The Office Action rejected claims 1 – 4, 6 – 8, 10 – 13, 15 – 17, 19 – 22, 24 – 26, and 28 – 30 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,247,020

to Minard (“*Minard*”). For the reasons set forth below, the rejection should be withdrawn and the claims allowed.

Independent Claim 1

The method of claim 1 includes the steps of “*displaying a tree structure on a **first portion** of a graphical user interface*” and “*displaying a search result in a **third portion** of the graphical user interface, the search result comprising one or more locations that satisfy the search request.*”

As to the alleged display of a tree structure, *Minard* discloses, at most:

“Navigation pane 410 displays a tree 411 comprising a single parent node that may have children.” (*Emphasis added*, Col. 8, lines 64-65). As to the alleged display of a search result, *Minard* discloses, at most, that “after the user has completed input, the system finds all the files with the search word in them and displays their names in the Navigation pane (in a tree).” (*Emphasis added*, Col. 12, lines 53 – 55). Thus, unlike claim 1, the user interface of *Minard* displays both the alleged tree structure and the alleged search result in the same portion of its user interface. Applicant further submits that a “search result comprising one or more locations that satisfy the search request” is not displayed in either of the *Minard* Structure or Content panes. Rather, *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (Col. 12, line 55).

Therefore, *Minard* does not disclose, teach, or suggest both “displaying a tree structure on a first portion of a graphical user interface” and “displaying a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request” as recited in claim 1, and the claim should be allowed for this reason alone.

Applicant further submits that claim 1 patentably defines over *Minard* for at least the additional reason that *Minard* fails to disclose or otherwise teach “***displaying a tree structure on a first portion of a graphical user interface***” and “***in response to selection of one of the locations, modifying the tree structure to display the selected location of the object having the predefined value.***” Thus, the tree structure displayed in the first portion is also modified “to display the selected location of the object having the predefined value.”

Unlike claim 1, *Minard* does not disclose modifying “the tree structure” (alleged to be displayed in the Navigation pane) “to display the selected location of the object having the predefined value.” Rather, *Minard* discloses that the names of files found with a search word in them are displayed in the Navigation pane (Col. 12, line 55), and that in response to the selection of the files found, “the content pane 853 and the structure pane 855 update the display of the respective information based on the newly selected node.” (*Emphasis added*, col. 13, lines 60 – 62). Thus, *Minard* does not disclose, teach, or suggest the step of “in response to selection of one of the locations, modifying the tree structure to display the selected location of the object having the predefined value” as recited in claim 1, and the claim should be allowed for this reason alone.

Accordingly, and for at least these reasons, the Applicant respectfully submits that independent claim 1 defines over *Minard* and, therefore, should be allowed. Furthermore, because independent claim 1 is allowable over the prior art of record, dependent claims 2 – 8 and 32 are allowable as a matter of law for at least the reason that they contain all the features and elements of their corresponding independent claim.

Dependent Claim 3

The method of claim 3 recites that “***the step of modifying the tree structure to display the selected location comprises highlighting the object having the predefined value.***” “The

selected location” of claim 3 relates to a selected “one or more locations that satisfy the search request” as recited in claim 1; from which claim 3 depends.

As to the alleged “locations that satisfy the search request,” *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (*Emphasis added*, Col. 12, line 55). As to the alleged highlighting of an object, *Minard* discloses only that “not only does the structure pane show the user the structure of the file, the user can also use it as a quick navigation tool to the various structural elements in the file” (Col. 11, lines 29 – 31), and that “the user can then click on any of those elements in the structure pane and the content pane will move to and highlight that element in the source code.” (Col. 11, lines 34 – 36).

Thus, the “elements,” appearing in the structure and content panes, and apparently highlighted in *Minard*, are not “locations that satisfy a search request” as recited in claim 3. Thus, *Minard* does not disclose, teach, or suggest that “the step of modifying the tree structure to display the selected location comprises highlighting the object having the predefined value” as recited in claim 3. Accordingly, and for at least these reasons, the Applicant respectfully submits that dependent claim 3 defines over *Minard* and, therefore, should be allowed.

Independent Claim 10

The system of claim 10 includes logic configured to “*display a tree structure on a first portion of a graphical user interface*” and “*display a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request.*”

As to the alleged display of a tree structure, *Minard* discloses, at most: “Navigation pane 410 displays a tree 411 comprising a single parent node that may have children.” (*Emphasis added*, Col. 8, lines 64-65). As to the alleged display of a search result, *Minard* discloses, at most, that “after the user has completed input, the system finds all the files with the search word in them and displays their names in the Navigation pane (in a tree).” (*Emphasis added*, Col. 12, lines 53 – 55). Thus, unlike claim 10, the user interface of *Minard* displays both the alleged tree structure and the alleged search result in the same portion of its user interface. Applicant further submits that a “search result comprising one or more locations that satisfy the search request” is not displayed in either of the *Minard* Structure or Content panes. Rather, *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (Col. 12, line 55).

Therefore, *Minard* does not disclose, teach, or suggest both logic configured to “display a tree structure on a first portion of a graphical user interface” and “display a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request” as recited in claim 10, and the claim should be allowed for this reason alone.

Applicant further submits that claim 10 patentably defines over *Minard* for at least the additional reason that *Minard* fails to disclose or otherwise teach logic configured to “**display a tree structure on a first portion of a graphical user interface**” and “**modify, in response to selection of one of the locations, the tree structure to display the selected location of the object having the predefined value.**” Thus, the tree structure displayed in the first portion is also modified “to display the selected location of the object having the predefined value.”

Unlike claim 10, *Minard* does not disclose modifying “the tree structure” (alleged to be displayed in the Navigation pane) “to display the selected location of the object having the predefined value.” Rather, *Minard* discloses that the names of files found with a search word

in them are displayed in the Navigation pane (Col. 12, line 55), and that in response to the selection of the files found, “the content pane 853 and the structure pane 855 update the display of the respective information based on the newly selected node.” (*Emphasis added*, col. 13, lines 60 – 62). Thus, *Minard* does not disclose, teach, or suggest logic configured to “modify, in response to selection of one of the locations, the tree structure to display the selected location of the object having the predefined value” as recited in claim 10, and the claim should be allowed for this reason alone.

Accordingly, and for at least these reasons, the Applicant respectfully submits that independent claim 10 defines over *Minard* and, therefore, should be allowed. Furthermore, because independent claim 10 is allowable over the prior art of record, dependent claims 11 – 17 and 33 are allowable as a matter of law for at least the reason that they contain all the features and elements of their corresponding independent claim.

Dependent Claim 12

The system of claim 12 recites that the logic is further configured to “***modify the tree structure to display the selected location comprises highlighting the object having the predefined value.***” “The selected location” of claim 12 relates to a selected “one or more locations that satisfy the search request” as recited in claim 10, from which claim 12 depends.

As to the alleged “locations that satisfy the search request,” *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (*Emphasis added*, Col. 12, line 55). As to the alleged highlighting of an object, *Minard* discloses only that “not only does the structure pane show the user the structure of the file, the user can also use it as a quick navigation tool to the various structural elements in the file” (Col. 11, lines 29 – 31), and that “the user can then click on any of those elements in the structure pane and

the content pane will move to and highlight that element in the source code.” (Col. 11, lines 34 – 36).

Thus, the “elements,” appearing in the structure and content panes, and apparently highlighted in *Minard*, are not “locations that satisfy a search request” as recited in claim 12. Thus, *Minard* does not disclose, teach, or suggest logic further configured to “***modify the tree structure to display the selected location comprises highlighting the object having the predefined value***” as recited in claim 12. Accordingly, and for at least these reasons, the Applicant respectfully submits that dependent claim 12 defines over *Minard* and, therefore, should be allowed.

Independent Claim 19

The computer program embodied on a computer-readable medium of claim 19 includes logic configured to “***display a tree structure on a first portion of a graphical user interface***” and “***display a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request.***”

As to the alleged display of a tree structure, *Minard* discloses, at most: Navigation pane 410 displays a tree 411 comprising a single parent node that may have children.” (*Emphasis added*, Col. 8, lines 64-65). As to the alleged display of a search result, *Minard* discloses, at most, that “after the user has completed input, the system finds all the files with the search word in them and displays their names in the Navigation pane (in a tree).” (*Emphasis added*, Col. 12, lines 53 – 55). Thus, unlike claim 19, the user interface of *Minard* displays both the alleged tree structure and the alleged search result in the same portion of its user interface. Applicant further submits that a “search result comprising one or more locations that satisfy the search request” is not displayed in either of the *Minard*

Structure or Content panes. Rather, *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (Col. 12, line 55).

Therefore, *Minard* does not disclose, teach, or suggest both logic configured to “display a tree structure on a first portion of a graphical user interface” and “display a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request” as recited in claim 19, and the claim should be allowed for this reason alone.

Applicant further submits that claim 19 patentably defines over *Minard* for at least the additional reason that *Minard* fails to disclose or otherwise teach logic configured to “**display a tree structure on a first portion of a graphical user interface**” and “**modify, in response to selection of one of the locations, the tree structure to display the selected location of the object having the predefined value.**” Thus, the tree structure displayed in the first portion is also modified “to display the selected location of the object having the predefined value.”

Unlike claim 19, *Minard* does not disclose modifying “the tree structure” (alleged to be displayed in the Navigation pane) “to display the selected location of the object having the predefined value.” Rather, *Minard* discloses that the names of files found with a search word in them are displayed in the Navigation pane (Col. 12, line 55), and that in response to the selection of the files found, “the content pane 853 and the structure pane 855 update the display of the respective information based on the newly selected node.” (*Emphasis added*, col. 13, lines 60 – 62). Thus, *Minard* does not disclose, teach, or suggest logic configured to “modify, in response to selection of one of the locations, the tree structure to display the selected location of the object having the predefined value” as recited in claim 19, and the claim should be allowed for this reason alone.

Accordingly, and for at least these reasons, the Applicant respectfully submits that independent claim 19 defines over *Minard* and, therefore, should be allowed. Furthermore,

because independent claim 19 is allowable over the prior art of record, dependent claims 20 – 26 and 34 are allowable as a matter of law for at least the reason that they contain all the features and elements of their corresponding independent claim.

Dependent Claim 21

Claim 21 recites that the logic is further configured to “***modify the tree structure to display the selected location comprises highlighting the object having the predefined value.***” “The selected location” of claim 21 relates to a selected “one or more locations that satisfy the search request” as recited in claim 19, from which claim 21 depends.

As to the alleged “locations that satisfy the search request,” *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (*Emphasis added*, Col. 12, line 55). As to the alleged highlighting of an object, *Minard* discloses only, that “not only does the structure pane show the user the structure of the file, the user can also use it as a quick navigation tool to the various structural elements in the file” (Col. 11, lines 29 – 31), and that “the user can then click on any of those elements in the structure pane and the content pane will move to and highlight that element in the source code.” (Col. 11, lines 34 – 36).

Thus, the “elements,” appearing in the structure and content panes, and apparently highlighted in *Minard*, are not “locations that satisfy a search request” as recited in claim 21. Thus, *Minard* does not disclose, teach, or suggest logic further configured to “***modify the tree structure to display the selected location comprises highlighting the object having the predefined value***” as recited in claim 21. Accordingly, and for at least these reasons, the Applicant respectfully submits that dependent claim 21 defines over *Minard* and, therefore, should be allowed.

Independent Claim 28

The system of claim 28 includes “*means for displaying a tree structure on a **first portion** of a graphical user interface*” and “*means for displaying a search result in a **third portion** of the graphical user interface, the search result comprising one or more locations that satisfy the search request.*”

As to the alleged display of a tree structure, *Minard* discloses, at most that “Navigation pane 410 displays a tree 411 comprising a single parent node that may have children.” (*Emphasis added*, Col. 8, lines 64-65). As to the alleged display of a search result, *Minard* discloses, at most, that “after the user has completed input, the system finds all the files with the search word in them and displays their names in the Navigation pane (in a tree).” (*Emphasis added*, Col. 12, lines 53 – 55). Thus, unlike claim 28, the user interface of *Minard* displays both the alleged tree structure and the alleged search result in the same portion of its user interface. Applicant further submits that a “search result comprising one or more locations that satisfy the search request” is not displayed in either of the *Minard* Structure or Content panes. Rather, *Minard* discloses only that “files with the search word in them” are displayed “in the Navigation pane.” (Col. 12, line 55).

Therefore, *Minard* does not disclose, teach, or suggest both “means for displaying a tree structure on a first portion of a graphical user interface” and “means for displaying a search result in a third portion of the graphical user interface, the search result comprising one or more locations that satisfy the search request” as recited in claim 28, and the claim should be allowed for this reason alone.

Applicant further submits that claim 28 patentably defines over *Minard* for at least the additional reason that *Minard* fails to disclose or otherwise teach “*means for displaying a tree structure on a first portion of a graphical user interface*” and “*means for modifying the tree structure to display the selected location of the object having the predefined value in*

response to selection of one of the locations.” Thus, the tree structure displayed in the first portion is also modified “to display the selected location of the object having the predefined value.”

Unlike claim 1, *Minard* does not disclose modifying “the tree structure” (alleged to be displayed in the Navigation pane) “to display the selected location of the object having the predefined value.” Rather, *Minard* discloses that the names of files found with a search word in them are displayed in the Navigation pane (Col. 12, line 55), and that in response to the selection of the files found, “the content pane 853 and the structure pane 855 update the display of the respective information based on the newly selected node.” (*Emphasis added*, col. 13, lines 60 – 62). Thus, *Minard* does not disclose, teach, or suggest “means for modifying the tree structure to display the selected location of the object having the predefined value in response to selection of one of the locations” as recited in claim 28, and, the claim should be allowed for this reason alone.

Accordingly, and for at least these reasons, the Applicant respectfully submits that independent claim 28 defines over *Minard* and, therefore, should be allowed. Furthermore, because independent claim 28 is allowable over the prior art of record, dependent claims 29 – 30 and 35 are allowable as a matter of law for at least the reason that they contain all the features and elements of their corresponding independent claim.

Dependent Claims 2, 4,6-8, 11, 13, 15-17, 20, 22, 24-26, and 29-30

Applicant submits that the rejection of claims 2, 4, 6 – 8, 11, 13, 15 – 17, 20, 22, 24 – 26, and 29 – 30 is rendered moot in light of any of the arguments made above and, therefore, claims 2, 4,6-8, 11, 13,15-17, 20, 22, 24-26, and 29-30 are allowable as a matter of law for at least the reason that claims 2, 4,6-8, 11, 13,15-17, 20, 22, 24-26, and 29-30 contain all the features of their corresponding independent claims.

III. Claims 5, 14 and 23 are Patentable Over *Minard*

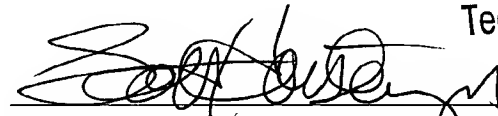
The Office Action rejects claims 5, 14 and 23 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Minard*. Without acquiescing to this argument, Applicant submits that this rejection is rendered moot in light of any of the arguments made above and, therefore, claims 5, 14, and 23 are allowable as a matter of law for at least the reason that claims 5, 14, and 23 contain all the features and element of their corresponding independent claims.



CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

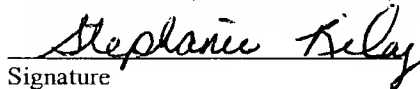

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